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Counsel for Plaintiff Lisa Vizcarra and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LISA VIZCARRA, individually, and on behalf of those similarly situated,

Plaintiff,

V.

UNILEVER UNITED STATES, INC.,

Defendant.

Case No. 4:20-cv-02777-YGR

DECLARTION OF MICHAEL R. REESE IN
SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO
ELECTRONICALLY FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULE 79-5

Date: N/A

Time: N/A

Place: Courtroom 1, 4th Floor

Judge: Honorable Yvonne Gonzalez Rogers

REESE DECLARATION RE ADMINISTRATIVE MOTION TO FILE UNDER SEAL
Vizcarra v. Unilever United States, Inc., No. 4:20-cv-02777-YGR

1 Pursuant to 28 U.S.C. § 1746, I, Michael R. Reese, declare as follows:

2 1. I am a partner at the law firm of Reese LLP, which is co-counsel for Lisa Vizcarra,
3 the plaintiff in the above-captioned action (“Plaintiff”).

4 2. I am a member in good standing of the bars of the States of California and New
5 York, as well as the bars of the United States District Courts for the Northern District of
6 California, Southern District of California, Central District of California, and, Eastern District of
7 California among other federal bars.

8 3. I submit this declaration in support of Plaintiff’s Administrative Motion for Leave
9 to Electronically File Documents under Seal Pursuant to Civil Local Rule 79-5, filed concurrently
10 herewith.

11 4. The facts set forth in this declaration are based on personal knowledge, and I could
12 competently testify to them if called upon to do so.

13 5. The Court entered a Stipulated Protective Order governing, among other things,
14 designation and filing of confidential, proprietary, or private information in the above-captioned
15 action on September 3, 2020. See Stipulated Protective Order ECF No. 37.

16 6. During discovery in this case, Plaintiff served Defendants with interrogatories and
17 document requests (“Discovery Requests”).

18 7. In response to Plaintiff’s Discovery Requests, Defendant interrogatory responses
19 and documents that Defendant designated as CONFIDENTIAL.

20 8. For the reasons given above, Plaintiff seeks to file the following documents and
21 information under seal pursuant to Civil Local Rule 79-5:
22

<u>DOCUMENT</u>	<u>PORTION SOUGHT TO BE SEALED</u>
Motion for Class Certification and	Page 3, lines 6-8
Memorandum of Law in Support Thereof	Page 4, lines 10-11
	Page 5, line 11

1	Exhibit B to the Declaration of Michael R. Reese, which is Defendant's Responses to Plaintiff's First Set of Interrogatories and which Defendant has marked as confidential	Entirety
5	Exhibit C to the Declaration of Michael R. Reese, which is Defendant's First Supplement Response to Plaintiff's Interrogatories 1, 3,4, 10 and 13 and which Defendant has marked as confidential	Entirety
10	Exhibit D to the Declaration of Michael R. Reese, which is Defendant's First Supplement Response to Plaintiff's Interrogatories 8 and 9 and which Defendant has marked as confidential	Entirety
15	Exhibit E to the Declaration of Michael R. Reese, which are Defendant's sales figures that Defendant produced in discovery and marked as confidential	Entirety

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20 I declare under penalty of perjury under the laws of the United States of America that the
 21 foregoing is true and correct.

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REESE LLP

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By: /s/ Michael R. Reese
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*Counsel for Plaintiff Lisa Vizcarra and the
 Proposed Class*

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